



Norman H. Bangerter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

August 6, 1991

Ms. Cindy Emmons, Director
Environmental Affairs
Kennecott Utah Copper
P. O. Box 525
Bingham Canyon, Utah 84006-0525

Dear Ms. Emmons,

Re: 4th Line Expansion Review, Kennecott Utah Copper, M/035/002, Salt Lake County, Utah

The Division is in the process of reviewing your amendment to the 4th Line. We have some initial comments that we would like Kennecott to review and address. We hope to perform an inspection of the 4th Line site in the middle of August. We will call you to set up a specific time. Our comments are provided below:

1. Page iv, List of Figures. Drawing 271-SKC-120 Rev. F "Disturbed Area Maps" is shown partially in boldface print indicating that it was revised, but this drawing is not included in the submission. The previous submission contains drawing 271-SKC-120 Rev. B.
2. Page 6, Proposed Surface Disturbance. Drawing 271-SKC-120 Rev. C is referenced and shown in boldface print but is not contained in this submission. The clay and select fill borrow area are referenced in the text, but it is unclear where these areas actually are. The only borrow area on the drawings submitted is labelled as Existing Borrow Area on drawing (2) 271-SKC-116 Rev. H. This same drawing contains an Existing Select Fill Stockpile, but not a select fill borrow area. Please clarify where these areas are.
3. Page 7, Proposed Surface Disturbance. Reference is made in the text to general fill stockpile No. 1. Drawing (2) 271-SKC-116 Rev. H shows an Existing Common Fill Stockpile and a portion of General Fill Pile No. 2, but no General Fill Stockpile No. 1. Where and what is General Fill Stockpile No. 1?

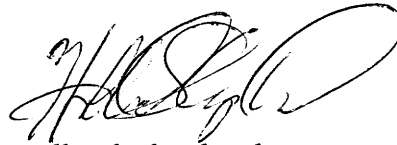
It is assumed that General Fill Pile No. 2 (drawing label) and General Fill Stockpile No. 2 (text label) are one and the same. Please verify this. Only a portion of General Fill Pile No. 2 is shown on the H revision of the 116 drawing with reference to see the inset on drawing 2271-SKC-120. This submission contained no version of the 120 drawing. The previously submitted 120 drawing (Rev. B) is not consistent with this 116 drawing. This discrepancy needs to be corrected. Is there a new 120 drawing that was supposed to be in this amended plan?

4. Page 11, Final (Post-Mining) Reclamation Plan. Topsoil Stockpiles Nos. 1 and 2 are referenced in the text. Where or what is Topsoil Stockpile No. 1? Is Topsoil Stockpile No. 1 what was labelled as "Future Topsoil Stockpile" in the previously submitted drawing 271-SKC-120 Rev. B? Only New Topsoil Stockpiles Nos. 2 and 3 are shown on (2) 271-SKC-116 Rev. H.
5. Page 27, Table 6, Earthwork Detail. This table shows the addition of 41,000 cy of material with an Item Description of "topsoil in Select Fill Borrow area, Drum Storage Area, the Clay and General Fill Stockpile No. 2." This figure was not included in this table in the previous submission. What is this material and where did it come from? Does the 126,000 cy subtotal earthwork figure in Table 6 include the amendment's new topsoil figure of 85,780 cy? This table does not list Topsoil Stockpile No. 3 with 7,780 cy. Why? Is Stockpile No. 3 included in something else?
6. Page 38, Table 17, Post Mining Reclamation. This table lists a total of 114 acres as being prepared and planted. The amended text lists the total project disturbance as 136 acres (not including temporary construction disturbance). The difference between these two figures is 22 acres. Pages 11-12 of the text lists the features which will remain after reclamation of the pipeline and (ore) conveyor service roads, the ore slurry pipeline, the return water pipeline, and the plant access road. It is assumed that the items which will remain constitute the 22 acres. Please verify this assumption. What is the itemized breakdown of these 22 acres which will not receive any revegetation treatments?

Page 3
Kennecott Utah Copper
M/035/002
August 6, 1991

We hope that these questions can be addressed by the time of our inspection of the site in August. Please contact Tony Gallegos or me if you have questions regarding the content of this letter. Thank you for your attention to these permitting concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Shepherd", written in a cursive style.

Holland Shepherd
Senior Reclamation Specialist

jb
cc: Lowell Braxton
D. Wayne Hedberg
M035002